

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

CAMBRIA COMPANY LLC,

Plaintiff,

Case No. 1:20-cv-508 (JMB/PJG)

vs.

Hon. Jane M. Beckering

LAKESIDE SURFACES, INC.,

**ORAL ARGUMENT REQUESTED**

Defendant.

\_\_\_\_\_ /

**PLAINTIFF CAMBRIA COMPANY LLC’S  
MOTION FOR SUMMARY JUDGMENT OF NO INVALIDITY**

Plaintiff Cambria Company LLC’s (“Cambria”) hereby moves for summary judgment dismissing Defendant Lakeside Surfaces, Inc.’s (“Lakeside”) defenses that U.S. Patent No. D780,332 (the “D’332 patent”) is invalid under 35 U.S.C. § 102 as anticipated, under § 103 as obvious, under § 112, paragraph 1, as not enabled and § 112, paragraph 2, as indefinite. This Motion is supported by a brief, declaration, and exhibits filed concurrently herewith.

Further, pursuant to L.R. 7.1(d), on June 24, 2022, counsel for Cambria contacted counsel for Lakeside and confirmed that Lakeside will oppose this Motion.

Finally, Cambria’s Motion is properly granted for the reasons stated in Cambria’s opening brief, filed herewith. A proposed order granting Cambria’s Motion for Summary Judgment of No Invalidity is attached hereto as Exhibit A.

s/ Gregory A. Lewis

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*Attorneys for Plaintiff Cambria Company  
LLC*

Dated: June 24, 2022

# **EXHIBIT A**

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\_\_\_\_\_ /

**ORDER**

This matter came on before the undersigned on Plaintiff Cambria Company LLC's ("Cambria's") Motion for Summary Judgment of No Invalidity.

Upon consideration of the papers filed in support of Cambria's Motion for Summary Judgment of No Invalidity, it is **ORDERED** that Cambria's Motion for Summary Judgment of No Invalidity is **GRANTED**.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2022

\_\_\_\_\_  
The Honorable Judge Jane M. Beckering  
United States District Judge